

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE

Case

12-CA-294015

Date Filed

4/12/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Amazon.com Services, LLC.		b. Tel. No. (407) 232-6700
		c. Cell No. (407) 927-5510
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 12340 Boggy Creek Road  FL Orlando 32824	e. Employer Representative (b) (6), (b) (7)(C) [REDACTED]	g. e-mail (b) (6), (b) (7)(C)@amazon.com
		h. Number of workers employed 2465
i. Type of Establishment (factory, mine, wholesaler, etc.)		j. Identify principal product or service

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 1,4 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

--See additional page--

(b) (6), (b) (7)(C) ty filing charge (if labor organization, give full name, including local name and number)

4a. Address (Street and number, city, state, and ZIP code)  (b) (6), (b) (7)(C) [REDACTED]	4b. Tel. No. (b) (6), (b) (7)(C)
	4c. Cell No.
	4d. Fax No.
	4e. e-mail (b) (6), (b) (7)(C)

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(signature of representative or person making charge)

(Print/type name and title or office, if any)

(b) (6), (b) (7)(C)

Address

Date 04/12/2022 08:56:10 PM

Tel. No.

(b) (6), (b) (7)(C)

Office, if any, Cell No.

Fax No.

e-mail

(b) (6), (b) (7)(C)

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

### Basis of the Charge

#### 8(a)(1)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	First Written Warning (Productivity)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	Deduction of 102 hours of Unpaid Time (UPT)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	Failure to Accommodate Work Restrictions	(b) (6), (b) (7) /2022
(b) (6), (b) (7)(C)	Transfer Request(s) Denied	(b) (6), (b) (7) /2022
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) (Accommodation Denial)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	5 Disciplinary Actions in a Calendar Year	
(b) (6), (b) (7)(C)	Failure to Reassign to Vacant Position (A.D.A.)	
(b) (6), (b) (7)(C)	Failure to adjust work rules to allow Transfer	

#### 8(a)(4)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) filed charges or cooperated with the NLRB.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	First Written Warning (Productivity)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	Deduction of 102 hours of Unpaid Time (UPT)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	Failure to Accommodate Work Restrictions	(b) (6), (b) (7) /2022
(b) (6), (b) (7)(C)	Transfer Request(s) Denied	(b) (6), (b) (7) /2022
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) (Accommodation Denial)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	5 Disciplinary Actions in a Calendar Year	
(b) (6), (b) (7)(C)	Failure to adjust work rules to allow Transfer	
(b) (6), (b) (7)(C)	Failure to Reassign to Vacant Position (A.D.A.)	

#### 8(a)(1)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting wages, hours, or other terms and conditions of employment and in order to discourage

employees from engaging in protected concerted activities.

Name of employee refused hire	Approximate date of refusal to hire
(b) (6), (b) (7)(C)	

**8(a)(4)**

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) filed charges or cooperated with the NLRB.

Name of employee refused hire	Approximate date of refusal to hire
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six months, the Employer refused to recall an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, discussing wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employees denied reinstatement or recall	Date restatement or recall denied
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employees denied reinstatement or recall	Date restatement or recall denied
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by promising better working conditions if employees did not join or support a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	(b) (6), (b) (7) /2022
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	

(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by engaging in surveillance or creating impression of surveillance of employees' union activities.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	(b) (6), (b) (7)/2021
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prohibit employees from discussing wages, hours, or other terms or conditions of employment.

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from forming, joining, or supporting a labor organization.

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from contacting and/or filing charges with the National Labor Relations Board.

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from engaging in protected concerted activities.

Work Rule
Off-Duty Site Access
Off-Duty Site Access During Severe Weather
No system in place to challenge Appeals Process
Staffing Command Center (SCC)
Nondisclosure of Work/Production Rate
Time Off Task deducted during "bio breaks"

V.O.A. Board unavailable during nonworking hours
Awarding Internal Transfer(s) based on Seniority
Appeals Process Decisions are Final/Binding
Panel Hearing decisions based on policy, not facts
Lack of Representation during Appeals Process
Disciplinary Actions inhibit ability to transfer
Central Investigations (CI) findings not disclosed



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 12  
201 E Kennedy Blvd, Ste 530  
Tampa, FL 33602-5824

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (813)228-2641  
Fax: (813)228-2874



Download  
NLRB  
Mobile App

April 14, 2022

(b) (6), (b) (7)(C)

Amazon.com Services, LLC  
12340 Boggy Creek Road  
Orlando, FL 32824

Re: Amazon.com Services, LLC.  
Case 12-CA-294015

Dear (b) (6), (b) (7)(C):

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney RAFAEL AYBAR whose telephone number is (813)228-2652. If this Board agent is not available, you may contact Supervisory Field Examiner CHASTITY PABON-LOCKLEY whose telephone number is (813)228-2470.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board

agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink that reads "David Cohen". The signature is written in a cursive, flowing style.

DAVID COHEN  
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



## QUESTIONNAIRE ON COMMERCE INFORMATION

Please read carefully, answer all applicable items, and return to the NLRB Office. If additional space is required, please add a page and identify item number.

CASE NAME	CASE NUMBER 12-CA-294015
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## 1. EXACT LEGAL TITLE OF ENTITY (As filed with State and/or stated in legal documents forming entity)

## 2. TYPE OF ENTITY

☐ CORPORATION ☐ LLC ☐ LLP ☐ PARTNERSHIP ☐ SOLE PROPRIETORSHIP ☐ OTHER (Specify )

## 3. IF A CORPORATION or LLC

A. STATE OF INCORPORATION OR FORMATION	B. NAME, ADDRESS, AND RELATIONSHIP (e.g. parent, subsidiary) OF ALL RELATED ENTITIES
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## 4. IF AN LLC OR ANY TYPE OF PARTNERSHIP, FULL NAME AND ADDRESS OF ALL MEMBERS OR PARTNERS

## 5. IF A SOLE PROPRIETORSHIP, FULL NAME AND ADDRESS OF PROPRIETOR

## 6. BRIEFLY DESCRIBE THE NATURE OF YOUR OPERATIONS (Products handled or manufactured, or nature of services performed).

## 7A. PRINCIPAL LOCATION:

## 7B. BRANCH LOCATIONS:

## 8. NUMBER OF PEOPLE PRESENTLY EMPLOYED

A. TOTAL:

B. AT THE ADDRESS INVOLVED IN THIS MATTER:

9. DURING THE MOST RECENT (Check the appropriate box): ☐ CALENDAR ☐ 12 MONTHS or ☐ FISCAL YEAR (FY DATES \_\_\_\_\_)

	YES	NO
A. Did you provide services valued in excess of \$50,000 directly to customers outside your State? If no, indicate actual value. \$ _____		
B. If you answered no to 9A, did you provide services valued in excess of \$50,000 to customers in your State who purchased goods valued in excess of \$50,000 from directly outside your State? If no, indicate the value of any such services you provided. \$ _____		
C. If you answered no to 9A and 9B, did you provide services valued in excess of \$50,000 to public utilities, transit systems, newspapers, health care institutions, broadcasting stations, commercial buildings, educational institutions, or retail concerns? If less than \$50,000, indicate amount. \$ _____		
D. Did you sell goods valued in excess of \$50,000 directly to customers located outside your State? If less than \$50,000, indicate amount. \$ _____		
E. If you answered no to 9D, did you sell goods valued in excess of \$50,000 directly to customers located inside your State who purchased other goods valued in excess of \$50,000 from directly outside your State? If less than \$50,000, indicate amount. \$ _____		
F. Did you purchase and receive goods valued in excess of \$50,000 from directly outside your State? If less than \$50,000, indicate amount. \$ _____		
G. Did you purchase and receive goods valued in excess of \$50,000 from enterprises who received the goods directly from points outside your State? If less than \$50,000, indicate amount. \$ _____		
H. Gross Revenues from all sales or performance of services (Check the largest amount) <input type="checkbox"/> \$100,000 <input type="checkbox"/> \$250,000 <input type="checkbox"/> \$500,000 <input type="checkbox"/> \$1,000,000 or more If less than \$100,000, indicate amount.		
I. Did you begin operations within the last 12 months? If yes, specify date: _____		

## 10. ARE YOU A MEMBER OF AN ASSOCIATION OR OTHER EMPLOYER GROUP THAT ENGAGES IN COLLECTIVE BARGAINING?

☐ YES ☐ NO (If yes, name and address of association or group).

## 11. REPRESENTATIVE BEST QUALIFIED TO GIVE FURTHER INFORMATION ABOUT YOUR OPERATIONS

NAME	TITLE	E-MAIL ADDRESS	TEL. NUMBER
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## 12. AUTHORIZED REPRESENTATIVE COMPLETING THIS QUESTIONNAIRE

NAME AND TITLE (Type or Print)	SIGNATURE	E-MAIL ADDRESS	DATE
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## PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary. However, failure to supply the information may cause the NLRB to refuse to process any further a representation or unfair labor practice case, or may cause the NLRB to issue you a subpoena and seek enforcement of the subpoena in federal court.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 12  
201 E Kennedy Blvd, Ste 530  
Tampa, FL 33602-5824

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (813)228-2641  
Fax: (813)228-2874



Download  
NLRB  
Mobile App

April 14, 2022

(b) (6), (b) (7)(C)

Re: Amazon.com Services, LLC.  
Case 12-CA-294015

Dear (b) (6), (b) (7)(C):

The charge that you filed in this case on April 12, 2022, has been docketed as case number 12-CA-294015. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney RAFAEL AYBAR whose telephone number is (813)228-2652. If this Board agent is not available, you may contact Supervisory Field Examiner CHASTITY PABON-LOCKLEY whose telephone number is (813)228-2470.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

**TENGA PRESENTE:** Esta carta contiene información importante acerca del cargo que usted presentó con la Junta Nacional de Relaciones del Trabajo (NLRB). En ella se explican sus

obligaciones para proveer evidencia que sustente su cargo y quién lo estará investigando. Si el Inglés no es su primer idioma y usted desea que esta carta se le explique en su primer idioma, puede comunicarse por escrito con la Oficina Regional a la dirección que aparece en esta carta o llamar al (813)228-2641. El NLRB está comprometido en asegurar, en la medida que sea posible, que las personas que no hablen Inglés puedan entender el procedimiento de sus casos.

*(PLEASE NOTE: This letter contains important information about the charge you filed with the NLRB. It explains your obligations to provide evidence in support of the charge and who will be investigating your charge. If you are not a native English speaker and would like this letter to be explained to you in your primary language, you may contact the Regional Office by letter at the above address or call (813)228-2641. The National Labor Relations Board is committed to ensuring, to the extent possible, that non-English speaking parties are able to understand the processing of their cases.)*

Very truly yours,

A handwritten signature in black ink that reads "David Cohen". The signature is fluid and cursive, with the first name "David" and last name "Cohen" clearly distinguishable.

DAVID COHEN  
Regional Director

**UNITED STATES OF AMERICA**  
**BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**AMAZON.COM SERVICES, LLC.**

Charged Party

and

**(b) (6), (b) (7)(C)**

Charging Party

**Case 12-CA-294015**

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, state under oath that on April 14, 2022, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

**(b) (6), (b) (7)(C)**

Amazon.com Services, LLC.

12340 Boggy Creek Road

Orlando, FL 32824

April 14, 2022

Date

Ed Ramos, Designated Agent of NLRB

Name

/s/ Ed Ramos

Signature

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Amazon.com Services, LLC

and

Individual

CASE 12-CA-294015

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
CHARGED PARTY

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Karla E. Sanchez  
MAILING ADDRESS: Seyfarth Shaw LLP, 233 South Wacker Drive, Suite 8000, Chicago, IL 60606  
E-MAIL ADDRESS: ksanchez@seyfarth.com  
OFFICE TELEPHONE NUMBER: 312-460-5000  
CELL PHONE NUMBER: \_\_\_\_\_ FAX: 312-460-7000  
SIGNATURE: /s/ Karla E. Sanchez  
(Please sign in ink.)  
DATE: 4-18-22

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Amazon.com Services, LLC
and
Individual

CASE 12-CA-294015

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Amazon.com Services, LLC


IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Samuel Schwartz-Fenwick	
MAILING ADDRESS: Seyfarth Shaw LLP, 233 S. Wacker Dr., Suite 8000, Chicago, IL 60606	
E-MAIL ADDRESS: sschwartz-fenwick@seyfarth.com	
OFFICE TELEPHONE NUMBER: (312) 460-5000	
CELL PHONE NUMBER:	FAX: (312) 460-7000
SIGNATURE: 	
(Please sign in ink.)	
DATE:	4/26/2022

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(REPRESENTATIVE INFORMATION)

NAME: Matthew A. Sloan	
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CELL PHONE NUMBER:	FAX: (312) 460-7000
SIGNATURE: 	
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UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**AMENDED CHARGE AGAINST EMPLOYER****DO NOT WRITE IN THIS SPACE**

Case

Date Filed

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer Amazon.com Services, LLC.		b. Tel. No. (407) 232-6700
		c. Cell No. (407) 927-5510
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 12340 Boggy Creek Road Orlando, FL 32824	e. Employer Representative (b) (6), (b) (7)(C)	g. e-mail (b) (6), (b) (7)(C) @amazon.com
		h. Number of workers employed 2465
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify principal product or service	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 1, 4 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

---See Additional Page---

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**

(b) (6), (b) (7)(C)

**4a. Address (Street and number, city, state, and ZIP code)**

(b) (6), (b) (7)(C)

**4b. Tel. No.****4c. Cell No.**

(b) (6), (b) (7)(C)

**4d. Fax No.****4e. e-mail**

(b) (6), (b) (7)(C)

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)****6. DECLARATION**

I declare that I have read the above charge and that the statements

(b) (6), (b) (7)(C) are true to the best of my knowledge and belief.

(b) (6), (b) (7)(C)

(Signature) (b) (6), (b) (7)(C) (making charge)

(Print/type name and title or office, if any)

**Tel. No.**

(b) (6), (b) (7)(C)

**Office, if any, Cell No.****Fax No.****e-mail**

(b) (6), (b) (7)(C)

Address

(b) (6), (b) (7)(C)

Date

4/27/2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## Basis of the Charge

### 8(a)(1)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	First Written Warning (Productivity)	(b) (6), (b) (7)(C) /2021
(b) (6), (b) (7)(C)	Deduction of 102 hours of Unpaid Time (UPT)	(b) (6), (b) (7)(C) /2021
(b) (6), (b) (7)(C)	Failure to Accommodate Work Restrictions	(b) (6), (b) (7)(C) /2022
(b) (6), (b) (7)(C)	Transfer Request(s) Denied	(b) (6), (b) (7)(C) /2022
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) (Accommodation Denial)	(b) (6), (b) (7)(C) /2021
(b) (6), (b) (7)(C)	5 Disciplinary Actions in a Calendar Year	
(b) (6), (b) (7)(C)	Failure to Reassign to Vacant Position (A.D.A.)	
(b) (6), (b) (7)(C)	Failure to adjust work rules to allow Transfer	

### 8(a)(4)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) filed charges or cooperated with the NLRB.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	First Written Warning (Productivity)	(b) (6), (b) (7)(C) /2021
(b) (6), (b) (7)(C)	Deduction of 102 hours of Unpaid Time (UPT)	(b) (6), (b) (7)(C) /2021
(b) (6), (b) (7)(C)	Failure to Accommodate Work Restrictions	(b) (6), (b) (7)(C) /2022
(b) (6), (b) (7)(C)	Transfer Request(s) Denied	(b) (6), (b) (7)(C) /2022
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) (Accommodation Denial)	(b) (6), (b) (7)(C) /2021
(b) (6), (b) (7)(C)	5 Disciplinary Actions in a Calendar Year	
(b) (6), (b) (7)(C)	Failure to adjust work rules to allow Transfer	
(b) (6), (b) (7)(C)	Failure to Reassign to Vacant Position (A.D.A.)	

### 8(a)(1)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting wages, hours, or other terms and conditions of employment and in order to discourage

employees from engaging in protected concerted activities.

Name of employee refused hire	Approximate date of refusal to hire
(b) (6), (b) (7)(C)	

**8(a)(4)**

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) filed charges or cooperated with the NLRB.

Name of employee refused hire	Approximate date of refusal to hire
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six months, the Employer refused to recall an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, discussing wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employees denied reinstatement or recall	Date restatement or recall denied
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employees denied reinstatement or recall	Date restatement or recall denied
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by promising better working conditions if employees did not join or support a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	(b) (6), (b) (7) /2021
(b) (6), (b) (7)(C)	(b) (6), (b) (7) /2022
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	

Grisbel Vargas	
M(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by engaging in surveillance or creating impression of surveillance of employees' union activities.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	
(b) (6), (b) (7)(C)	(b) (6), (b) (7)/2021
(b) (6), (b) (7)(C)	

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prohibit employees from discussing wages, hours, or other terms or conditions of employment.

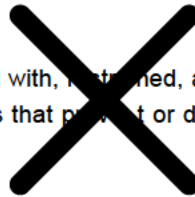


**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from forming, joining, or supporting a labor organization.

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from contacting and/or filing charges with the National Labor Relations Board.



**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from engaging in protected concerted activities.

Work Rule
Off-Duty Site Access
Off-Duty Site Access During Severe Weather
No system in place to challenge Appeals Process or to ensure diversity amongst Panelist Members
Staffing Command Center (SCC)
Associate Development and Performance Tracker (ADAPT)
Time Off Task deducted during "bio breaks" (restroom break, rest break, water break, etc.)

"Voice of the Associate Board" unavailable during nonworking hours
Awarding Internal Transfer(s) based on Seniority
Appeals Process Decisions are Final & Binding
Panel Hearing decisions based on employer policies & procedures, not facts of the case
Lack of Representation during Appeals Process
Disciplinary Actions inhibit ability to transfer to other departments
Central Investigations (CI) findings and penalties not disclosed to complainant



### Unlawful Statements or Conduct by Your Employer

- ☐ Threats of retaliation if employee(s) joined or supported a union
- ☐ Promises of better working conditions if employee(s) refrained from joining or supporting a union
- ☐ Spying on employee(s) who engaged in union activities
- ☒ Questioning employee(s) about their own or others' union activities

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by interrogating employees about their union activities.

Name of Employer's Agent/Representative who made the statement \*

Approximate date

Employee Name

MM/DD/YYYY

📅

Add

Click on Add button to save this entry.

#	Name of Employer's Agent/Representative who made the statement	Approximate date
1	(b) (6), (b) (7)(C)	
2		
3		
4		
5		
6		

- ☐ Denial of union representation during a disciplinary investigation

### Unlawful Work Rules Maintained by the Employer

- ☐ Rule prohibiting employees from discussing wages, hours, or other terms or conditions of employment (including communications on social media)